

THE HOPI TRIBE



Wayne Taylor, Jr.
CHAIRMAN

Phillip R. Quochytewa, Sr.
VICE-CHAIRMAN

March 28, 2001

Robert E. Hollis, Division Administrator
U. S. Department of Transportation
Federal Highway Administration
234 N. Central Ave., Suite 330
Phoenix, Arizona 85004

Re: I-17;SR101L-Black Canyon TI, Initial Consultation

Dear Mr. Hollis,

This letter is in response to your correspondence dated March 12, 2001, in which you notify the Hopi Tribe that the Arizona Department of Transportation and the Federal Highway Administration are in the pre-design planning stage for the proposed widening of Interstate 17 from the Loop 101 Interchange to Black Canyon City, (mileposts 214-245). As you know, we appreciate your solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office has reviewed the enclosed document by Archaeological Consulting Services, Inc. titled *Literature Review of Interstate 17 Between Pima Freeway and Black Canyon City, Maricopa and Yavapai Counties, Arizona*, which identified 95 sites in the project area. This report documents previous research and identifies known cultural resources that might be affected by the proposed undertaking, and demonstrates that many significant prehistoric archaeological sites will be adversely affected.

The Hopi Tribe considers the prehistoric archaeological sites identified in this report to be "footprints" of our ancestors. Many Hopi Traditional Cultural Places are identified in this report by site type as petroglyphs, prehistoric sherd and lithic scatters, rock features, ruins, prehistoric habitations and agricultural sites, and numerous other designations.

Therefore, we appreciate that Arizona Department of Transportation and the Federal Highway Administration are committed to further consultation on this project, subsequent to providing us with the cultural resources survey of this proposed project area. Thank you again for consulting with the Hopi Tribe.

Respectfully,


Leigh J. Kuwanwisiwma, Director
Cultural Preservation Office

cc: Serelle Laine, ADOT



PUBLIC WORKS ADMINISTRATION

8401 W. Monroe Street, Peoria, Arizona 85345

Phone: (623) 773-7367

Fax: (623) 773-7211

April 4, 2001

Jacqueline Noblitt
Project Manager
Stanley Consultants, Inc.
2929 E. Camelback Road, Suite 130
Phoenix, AZ 85016

Subject: Interstate 17 (I-17) / Loop 101 Traffic Interchange (TI)
to Black Canyon City TI Design Concept Study

Dear Ms. Noblitt:

I would appreciate knowing whether or not as part of the design concept study, you are going to take into consideration the 303 Interchange at I-17. Specifically, MAG has recently approved, and ADOT will be initiating, an environmental assessment on the 303 alignment which tentatively will be located on or about the Lone Mountain alignment at I-17. It is envisioned when ultimately constructed that the 303 will be a freeway on the west side of I-17 and through Phoenix's transportation plan, a major arterial on the east side of I-17.

Yours very truly,

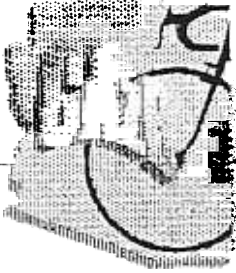
A handwritten signature in black ink, appearing to read "David A. Moody".

David A. Moody, P.E.
Public Works/Engineering Director

DAM:lbg

c Terry Ellis, City Manager
Meredith Flinn, Deputy City Manager

t:\admin\letters\Noblitt_I-17-Loop101-InterchangeTI-0401



Coalition of Arizona Bicyclists

Box 54488, Phoenix, AZ 85078-4488 602-485-1198
coalitionazbicyclists@yahoo.com
www.cazbike.org

April 9, 2001

Jacqueline Noblitt
Project Manager
Stanley Consultants Inc

FAX 602 912 6599

RE: Interstate 17/Loop 101 Interchange to Black Canyon City TI Design Concept Study

Dear Ms. Noblitt:

The I-17 Corridor is the only direct route for bicyclists desiring to travel north out of Phoenix. Bicycles are permitted to use the I-17 shoulder north of Pinnacle Peak Road and it is essential and mandatory that any redesign of this segment not degrade the ability of bicyclists to travel north in this corridor. The following points must be considered:

There should be no change to the right of bicyclists to use the shoulder unless a parallel and directly accessible frontage or other road exists.

Any added or rebuilt shoulders must comply with the AASHTO standards defining a bike lane (although no bike lane or bike route signs will be expected).

Any "rumble strips" that are added or rebuilt are designed to provide minimal or no disruption to bicycle riders using the I-17 shoulder. ADOT internal studies as well as studies by other states describe designs that accomplish both the vehicular safety purposes while permitting safe and comfortable bicycle travel.

Appropriate monitoring of the construction process will be in place to assure that the final approved design is in fact constructed before the contractor(s) are paid.

We would like to remind Stanley Consultants and ADOT that the Federal Highway Administration rules, and federal statutes, require that the bicycle be considered in all federally funded projects and that the bicycle is to be included except where the Secretary DOT has determined that it would not be safe to do so. It should also be noted that there are significant sources of Federal funds to support the construction of alternative transportation mode facilities.

The Coalition of Arizona Bicyclists is prepared to work with Stanley Consultants and ADOT in the redesign of this segment of I-17. Please do not hesitate to contact us at any time.

Sincerely,

Richard A. Metz
Secretary

cc: Tami Wollaston, ADOT Project Monitor, Fax 602 712 8992

TO ENHANCE the role of bicycling in local, county and statewide transportation and recreation plans;

TO PROVIDE communications on matters of important concerning cycling

throughout the State of Arizona



A Stanley Group Company
Engineering, Environmental and Construction Services - Worldwide

May 14, 2001

Mr. David A. Moody, P.E.
Public Works/Engineering Director
City of Peoria
8401 W. Monroe Street
Peoria, Arizona 85345

RE I-17 Widening Study: SR 101L to Black Canyon City
TRACS No. 17 MA 215 H5162 01L

Dear Mr. Moody:

In response to your letter regarding consideration of the Loop 303 alignment by the I-17 Widening Study, the study will acknowledge the future presence of Loop 303 and will make every effort not to preclude any of the possible alignments.

As you are probably aware, ADOT will begin preparation of a design concept study and environmental assessment to evaluate Loop 303 alignments between Lake Pleasant Road and I-17 by the end of this year. We anticipate coordinating and sharing information with the Loop 303 study team.

Please let me know if you have questions or need additional information.

Sincerely,

Stanley Consultants Inc.

Jacqueline A. Noblitt, P.E.
Project Manager

cc: George Wallace, ADOT Studies
Tami Wollaston, ADOT Studies
Steve Jimenez, ADOT VPM

Q/14791/admin/correspondence/lopeoria5-01.doc



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

2221 WEST GREENWAY ROAD, PHOENIX, AZ 85023-4399
(602) 942-3000 • WWW.AZGFD.COM

GOVERNOR
JANE DEE HULL
COMMISSIONERS
CHAIRMAN, DENNIS D. MANNING, ALPINE
MICHAEL M. GOLIGHTLY, FLAGSTAFF
JOE CARTER, SAFFORD
SUSAN E. CHILTON, ARIVACA
W. HAYS GILSTRAP, PHOENIX
DIRECTOR
DUANE L. SHROUFE
DEPUTY DIRECTOR
STEVE K. FERRELL



December 6, 2001

Ms. Laura Gerbis
Sverdrup Civil Inc.
875 W. Elliot Rd.
Suite 201
Tempe, AZ 85284

Re: Special Status Species Information for I-17 Mileposts 214.5 to 233; ADOT
Project I-17 Loop 101 Traffic Interchange to New River Design Concept
Study, TRACS #017 MA 214 H5162 01L.

Dear Ms. Gerbis:

The Arizona Game and Fish Department (Department) has reviewed your request, dated November 28, 2001, regarding special status species information associated with the above-referenced project area. The Department's Heritage Data Management System (HDMS) has been accessed and current records show that the special status species listed on the attachment have been documented as occurring in the project area. In addition, the project does not occur in the vicinity of any proposed or designated Critical Habitats.

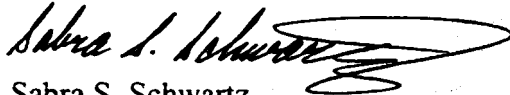
The Department's HDMS data are not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity.

Making available this information does not substitute for the Department's review of project proposals, and should not decrease our opportunities to review and evaluate new project proposals and sites. The Department is also concerned about other resource values, such as other wildlife, including game species, and wildlife-related recreation. The Department would appreciate the opportunity to provide an evaluation of impacts to wildlife or wildlife habitats associated with project activities occurring in the subject area, when specific details become available.

Ms. Laura Gerbis
December 6, 2001
2

If you have any questions regarding the attached species list, please contact me at (602) 789-3618. General status information and county distribution lists for special status species are also available on our web site at:
http://www.azgfd.com/frames/fishwild/hdms_site/Home.htm.

Sincerely,



Sabra S. Schwartz
Heritage Data Management System, Coordinator

SSS:ss

Attachment

cc Bob Broscheid, Project Evaluation Program Supervisor
Russ Haughey, Habitat Program Manager, Region VI

AGFD #11-30-01(10)

Special Status Species within 2 Miles of I-17 Milepost 214.5 to 233

Arizona Game and Fish Department, Heritage Data Management System

December 6, 2001

Scientific Name	Common Name	ESA	USFS	BLM	WSCA	NPL
GOPHERUS AGASSIZII (SONORAN POPULATION)	SONORAN DESERT TORTOISE	SC			WC	

No Critical Habitat in project area. AGFD #11-30-01(10), ADOT Project I-17 Loop 101 Traffic Interchange to New River Design Concept Study, TRACS #017 MA 214 H5162 01L.

STATUS DEFINITIONS
ARIZONA GAME AND FISH DEPARTMENT (AGFD)
HERITAGE DATA MANAGEMENT SYSTEM (HDMS)

FEDERAL US STATUS

ESA Endangered Species Act (1973 as amended)
US Department of Interior, Fish and Wildlife Service (<http://arizonaes.fws.gov>)

Listed

- LE** Listed Endangered: imminent jeopardy of extinction.
- LT** Listed Threatened: imminent jeopardy of becoming Endangered.
- XN** Experimental Nonessential population.

Proposed for Listing

- PE** Proposed Endangered
- PT** Proposed Threatened.

Candidate (Notice of Review: 1999)

- C** Candidate. Species for which USFWS has sufficient information on biological vulnerability and threats to support proposals to list as Endangered or Threatened under ESA. However, proposed rules have not yet been issued because such actions are precluded at present by other listing activity.
- SC** Species of Concern. The terms "Species of Concern" or "Species at Risk" should be considered as terms-of-art that describe the entire realm of taxa whose conservation status may be of concern to the US Fish and Wildlife Service, but neither term has official status (currently all former C2 species).

Critical Habitat (check with state or regional USFWS office for location details)

- Y** Yes: Critical Habitat has been designated.
- P** Proposed: Critical Habitat has been proposed.

[**\N** No Status: certain populations of this taxon do not have designated status (check with state or regional USFWS office for details about which populations have designated status)].

USFS US Forest Service (1999 Animals, 1999 Plants: corrected 2000)
US Department of Agriculture, Forest Service, Region 3 (<http://www.fs.fed.us/r3/>)

- S** Sensitive: those taxa occurring on National Forests in Arizona which are considered sensitive by the Regional Forester.

BLM US Bureau of Land Management (2000 Animals, 2000 Plants)
US Department of Interior, Bureau of Land Management, Arizona State Office
(<http://azwww.az.blm.gov>)

- S** Sensitive: those taxa occurring on BLM Field Office Lands in Arizona which are considered sensitive by the Arizona State Office.
- P** Population: only those populations of Banded Gila monster (*Heloderma suspectum cinctum*) that occur north and west of the Colorado River, are considered sensitive by the Arizona State Office.

TRIBAL STATUS**NESL Navajo Endangered Species List (2000)**

Navajo Nation, Navajo Fish and Wildlife Department

<http://www.heritage.tnc.org/nhp/us/navajo/esl.html>

The Navajo Endangered Species List contains taxa with status from the entire Navajo Nation which includes parts of Arizona, Utah, and New Mexico. In this notebook we provide NESL status for only those taxa whose distribution includes part or all of the Arizona portion of the Navajo Nation.

Groups

- 1** Those species or subspecies that no longer occur on the Navajo Nation.
- 2** Any species or subspecies which is in danger of being eliminated from all or a significant portion of its range on the Navajo Nation.
- 3** Any species or subspecies which is likely to become an endangered species, within the foreseeable future, throughout all or a significant portion of its range on the Navajo Nation.
- 4** Any species or subspecies for which the Navajo Fish and Wildlife Department (NF&WD) does not currently have sufficient information to support their being listed in Group 2 or Group 3 but has reason to consider them. The NF&WD will actively seek information on these species to determine if they warrant inclusion in a different group or removal from the list.

MEXICAN STATUS**MEX Mexican Federal Endangered Species List (October 16, 2000)**

Proyecto de Norma Oficial Mexicana PROY-NOM-059-ECOL-2000

The Mexican Federal Endangered Species List contains taxa with status from the entire Mexican Republic and waters under its jurisdiction. In this notebook we provide MEX designations for only those taxa occurring in Arizona and also in Mexico.

- P** En Peligro de Extinción (Determined Endangered in Mexico): in danger of extinction.
- A** Amenazada (Determined Threatened in Mexico): could become endangered if factors causing habitat deterioration or population decline continue.
- Pr** Sujeta a Protección Especial (Determined Subject to Special Protection in Mexico): utilization limited due to reduced populations, restricted distribution, or to favor recovery and conservation of the taxon or associated taxa.
- E** Probablemente extinta en el medio silvestre (Probably extinct in the wild of Mexico): A native species whose individuals in the wild have disappeared, based on pertinent documentation and studies that prove it. The only existing individuals of the species are in captivity or outside the Mexican territory.

[| = One or more subspecies of this species has status in Mexico, but the HDMS does not track it at the subspecies level (most of these subspecies are endemic to Mexico). Please consult the NORMA Oficial Mexicana PROY-NOM-059-ECOL-2000 for details.]

STATE STATUS**NPL Arizona Native Plant Law (1999)**

Arizona Department of Agriculture (<http://agriculture.state.az.us/PSD/nativeplants.htm>)

- HS** Highly Safeguarded: no collection allowed.
- SR** Salvage Restricted: collection only with permit.
- ER** Export Restricted: transport out of State prohibited.
- SA** Salvage Assessed: permits required to remove live trees.
- HR** Harvest Restricted: permits required to remove plant by-products.

WSCA Wildlife of Special Concern in Arizona (1996 in prep)

Arizona Game and Fish Department (<http://www.azgfd.com>)

- WC** Wildlife of Special Concern in Arizona. Species whose occurrence in Arizona is or may be in jeopardy, or with known or perceived threats or population declines, as described by the Arizona Game and Fish Department's listing of Wildlife of Special Concern in Arizona (WSCA, in prep). Species indicated on printouts as WC are currently the same as those in **Threatened Native Wildlife in Arizona (1988)**.

Revised 10/3/01, AGFD HDMS

J:\HDMS\DOCUMENT\NBOOKS\TEMPLATE\EORDEFS\STATDEF



COPY

Arizona Department of Transportation
Intermodal Transportation Division

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Jane Dee Hull
Governor

Victor M. Mendez
Director

December 23, 2002

Dick Wright
State Engineer

Connie Stone
Bureau of Land Management
Phoenix Field Office
21605 N. 7th Ave
Phoenix, AZ 85027

RE SHPO-2001-732 (5632)
Project #: NH-017-A(874)
TRACS#: 017 MA 214 H5162 01L
SR101L T.I. - New River T.I.
Section 106 Consultation

Dear Ms. Stone

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are in the pre-design planning stage for the proposed widening of Interstate 17 from the Loop 101 interchange to the New River interchange. Because this project may qualify for federal-aid funding it is considered an undertaking subject to Section 106 review. This project occurs on ADOT-owned land, and ADOT right-of-way across lands administered by Arizona Game and Fish Department (AZG&FD) and the Bureau of Land Management (BLM), and state trust lands administered by the Arizona State Land Department (ASLD). Consulting parties for this undertaking are FHWA, ADOT, ASLD, AZG&FD, the BLM, the San Carlos Apache Tribe, the White Mountain Apache Tribe, the Salt River Pima Maricopa Indian Community, the Hopi Tribe, and the Prescott-Yavapai Tribe. ADOT is consulting with you on behalf of FHWA pursuant to the Programmatic Agreement with SHPO for FHWA federal-aid projects.

The scope of this project would involve widening I-17 within the existing corridor from SR101L to the New River Traffic Interchange (T.I.), addressing improvements to the frontage roads, and improving existing interchanges as necessary to accommodate the widening of I-17. New right-of-way and/or temporary construction easements would be required. The project area of potential effect (APE) begins at approximately milepost (MP) 214 of I-17 (at the interchange with SR101L) and extends north to approximately MP 233 (the New River T.I.), within the existing I-17 corridor. The APE includes the existing ADOT right-of-way, new right-of-way required by the project, frontage roads, existing interchanges between MP 214 and 233 and temporary construction easements necessary for the project.

The project area has been surveyed by Archaeological Consulting Services, Ltd. (ACS) and is reported in *Cultural Resources Survey of Interstate 17 Between Milepost 214 and 233, Pima Freeway to the New River Traffic Interchange, Maricopa and Yavapai Counties, Arizona* (DeMaagd et al 2002). A copy of this report is enclosed here for your review and comment.

Thirty-two cultural resource sites were identified as part of this survey. One site, the Sun-Up Ranch (old Jacka Homestead) is listed on the National Register of Historic Places (NRHP). This site was listed on the NRHP in 1988 under Criterion 'a', as an excellent example homestead associated with the Depression era. The project area intrudes into the NRHP boundary, but would not effect any of the property's Register-eligible elements.

Three of the sites identified in the survey, AZ T:4:192(ASM), AZ T:4:337(ASM) and AZ T:4:346(ASM), are considered eligible for inclusion into the NRHP. AZ T:4:192(ASM) is the New River - Stricklin site, a large

multicomponent prehistoric habitation site. Site AZ T:4:337(ASM) is a large prehistoric habitation site. Site AZ T:4:346(ASM) is a prehistoric chalcedony quarry with a possible petroglyph feature.

Seven of the cultural resource sites identified would require further work to determine their eligibility: AZ T:4:330(ASM), AZ T:4:331(ASM), AZ T:4:338(ASM), AZ T:4:349(ASM), AZ T:8:153(ASM), AZ T:8:157(ASM) and AZ T:8:158(ASM). All of these sites are prehistoric artifact scatters, with the exception of site AZ T:8:153(ASM), which also includes a historic component.

The remaining 21 sites are not considered eligible for NRHP inclusion. Sites AZ T:4:332, 333, 334, 335, 336, 339, 340, 341, 347, and 350 (ASM) are all historic dirt road segments. None of these dirt road segments retain sufficient integrity or historic character to be considered eligible for the NRHP. Site AZ T:4:131(ASM) is the Old Black Canyon Highway. Seventeen segments of this road were identified within the project area. Only two of the 17 segments identified within the project APE are located within the ADOT right-of-way and would be impacted by the proposed project. The Old Black Canyon Highway is part of the Historic State Highway System; it is recommended as eligible for listing on the National Register of Historic Places (NRHP) under criterion 'd' for its potential to yield important information about the development of Arizona's roadways. However, the segments of this highway that would be impacted by this project lack the integrity necessary to provide valuable information and do not warrant further recordation.

Sites AZ T:4:329, 343, 344, 345, and 352 (ASM) are all prehistoric artifact scatters that are not eligible for the NRHP. Sites AZ T:4:342(ASM) and AZ T:8:152(ASM) are historic trash scatters that are not eligible for the NRHP. Sites AZ T:8:155 and 156(ASM) are historic foundation remnants and associated features that also lack the significance necessary to be eligible for the NRHP. Site AZ T:8:154(ASM) consists of three rock features of indeterminate age and is not eligible for the NRHP.

This project is in the early planning stages. At this time, ADOT cannot identify the impacts this project would have on historic properties. For that reason, ADOT and FHWA recommend that a Programmatic Agreement (PA) be prepared to address possible impacts to the historic properties identified in the attached survey report. The development of a PA would ensure the project meets the Section 106 obligations of this project.

Please review the attached report and the contents of this letter. If you agree with the identification of the scope of work, the concurring parties, the recommendations of NRHP eligibility and the recommendation to proceed with the development of a PA, please sign below to indicate your concurrence. If you have any questions, please contact me at (602) 712-8148 or via email at kneustadt@dot.state.az.us. Thank you.

Sincerely,

Kae Neustadt
Historic Preservation Specialist

Signature for BLM Concurrence

Date

enclosure

c. S. Thomas (FHWA)



Arizona Department of Transportation
Intermodal Transportation Division

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Jane Dee Hull
Governor

Victor M. Mendez
Director

December 23, 2002

Dick Wright
State Engineer

Steve Ross, Cultural Resources Manager
Arizona State Land Department
1616 W. Adams
Phoenix, AZ 85007

RE: SHPO-2001-732 (5632)
Project #: NH-017-A(874)
TRACS#: 017 MA 214 H5162 01L
SR101L T.I. - New River T.I.
Section 106 Consultation

Dear Mr. Ross:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are in the pre-design planning stage for the proposed widening of Interstate 17 from the Loop 101 interchange to the New River interchange. Because this project may qualify for federal-aid funding it is considered an undertaking subject to Section 106 review. This project occurs on ADOT-owned land, and ADOT right-of-way across lands administered by Arizona Game and Fish Department (AZG&FD) and the Bureau of Land Management (BLM), and state trust lands administered by the Arizona State Land Department (ASLD). Consulting parties for this undertaking are FHWA, ADOT, ASLD, AZG&FD, the BLM, the San Carlos Apache Tribe, the White Mountain Apache Tribe, the Salt River Pima Maricopa Indian Community, the Hopi Tribe, and the Prescott-Yavapai Tribe. ADOT is consulting with you on behalf of FHWA pursuant to the Programmatic Agreement with SHPO for FHWA federal-aid projects.

The scope of this project would involve widening I-17 within the existing corridor from SR101L to the New River Traffic Interchange (T.I.), addressing improvements to the frontage roads, and improving existing interchanges as necessary to accommodate the widening of I-17. New right-of-way and/or temporary construction easements would be required. The project area of potential effect (APE) begins at approximately milepost (MP) 214 of I-17 (at the interchange with SR101L) and extends north to approximately MP 233 (the New River T.I.), within the existing I-17 corridor. The APE includes the existing ADOT right-of-way, new right-of-way required by the project, frontage roads, existing interchanges between MP 214 and 233 and temporary construction easements necessary for the project.

The project area has been surveyed by Archaeological Consulting Services, Ltd. (ACS) and is reported in *Cultural Resources Survey of Interstate 17 Between Milepost 214 and 233, Pima Freeway to the New River Traffic Interchange, Maricopa and Yavapai Counties, Arizona* (DeMaagd et al 2002). A copy of this report is enclosed here for your review and comment.

Thirty-two cultural resource sites were identified as part of this survey. One site, the Sun-Up Ranch (old Jacka Homestead) is listed on the National Register of Historic Places (NRHP). This site was listed on the NRHP in 1988 under Criterion 'a', as an excellent example homestead associated with the Depression era. The project area intrudes into the NRHP boundary, but would not effect any of the property's Register-eligible elements.

Three of the sites identified in the survey, AZ T:4:192(ASM), AZ T:4:337(ASM) and AZ T:4:346(ASM), are considered eligible for inclusion into the NRHP. AZ T:4:192(ASM) is the New River - Stricklin site, a large

multicomponent prehistoric habitation site. Site AZ T:4:337(ASM) is a large prehistoric habitation site. Site AZ T:4:346(ASM) is a prehistoric chalcedony quarry with a possible petroglyph feature.

Seven of the cultural resource sites identified would require further work to determine their eligibility: AZ T:4:330(ASM), AZ T:4:331(ASM), AZ T:4:338(ASM), AZ T:4:349(ASM), AZ T:8:153(ASM), AZ T:8:157(ASM) and AZ T:8:158(ASM). All of these sites are prehistoric artifact scatters, with the exception of site AZ T:8:153(ASM), which also includes a historic component.

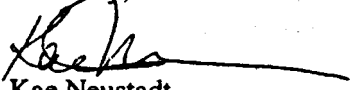
The remaining 21 sites are not considered eligible for NRHP inclusion. Sites AZ T:4:332, 333, 334, 335, 336, 339, 340, 341, 347, and 350 (ASM) are all historic dirt road segments. None of these dirt road segments retain sufficient integrity or historic character to be considered eligible for the NRHP. Site AZ T:4:131(ASM) is the Old Black Canyon Highway. Seventeen segments of this road were identified within the project area. Only two of the 17 segments identified within the project APE are located within the ADOT right-of-way and would be impacted by the proposed project. The Old Black Canyon Highway is part of the Historic State Highway System; it is recommended as eligible for listing on the National Register of Historic Places (NRHP) under criterion 'd' for its potential to yield important information about the development of Arizona's roadways. However, the segments of this highway that would be impacted by this project lack the integrity necessary to provide valuable information and do not warrant further recordation.

Sites AZ T:4:329, 343, 344, 345, and 352 (ASM) are all prehistoric artifact scatters that are not eligible for the NRHP. Sites AZ T:4:342(ASM) and AZ T:8:152(ASM) are historic trash scatters that are not eligible for the NRHP. Sites AZ T:8:155 and 156(ASM) are historic foundation remnants and associated features that also lack the significance necessary to be eligible for the NRHP. Site AZ T:8:154(ASM) consists of three rock features of indeterminate age and is not eligible for the NRHP.

This project is in the early planning stages. At this time, ADOT cannot identify the impacts this project would have on historic properties. For that reason, ADOT and FHWA recommend that a Programmatic Agreement (PA) be prepared to address possible impacts to the historic properties identified in the attached survey report. The development of a PA would ensure the project meets the Section 106 obligations of this project.

Please review the attached report and the contents of this letter. If you agree with the identification of the scope of work, the concurring parties, the recommendations of NRHP eligibility and the recommendation to proceed with the development of a PA, please sign below to indicate your concurrence. ADOT is concurrently consulting with SHPO. It is understood that ASLD may choose to not respond to this request at this time because no new right-of-way is needed from ASLD for this project. Should ASLD comment after the SHPO review period, ADOT would endeavor to address ASLD's concerns to the greatest extent possible. If you have any questions, please contact me at (602) 712-8148 or via email at kneustadt@dot.state.az.us. Thank you.

Sincerely,


Kae Neustadt
Historic Preservation Specialist

Signature for ASLD Concurrence

Date

enclosure

c. S. Thomas (FHWA)